

**REMARKS**

In this Amendment, Applicants amend the specification to correct grammar and typographical errors, and amend claims 21 – 24, 29, and 30, to more appropriately claim the present invention and to improve form. Applicants submit that the amendments contain no new matter, in accordance with the requirements of 37 C.F.R. § 1.121(f). Upon entry of this amendment, claims 21 – 32 remain pending and under current examination.

**Regarding the Office Action:**

In the Office Action, the Examiner rejected claims 21 – 32 under 35 U.S.C. § 102(e) as anticipated by Honda, et al. (U.S. Patent No. 6,201,309).

Applicants appreciate the Examiner's thorough examination of this application, especially the detailed citations which aided Applicants in reviewing the Examiner's comments. Applicants respectfully traverse the rejections, as detailed above, for the following reasons.

**Regarding the Amendments to Claims 21 – 24, 29, and 30:**

Applicants amend these claims to more appropriately define the present invention and to improve form. Representative of the amendments made, the amendment to claim 21, for example, specifies "linear" thermal expansion coefficient, to render it consistent with usage throughout the specification. *See*, for example, the specification page 4, lines 4 – 6. Applicants submit that the amendments contain no new matter, in accordance with the requirements of 37 C.F.R. § 1.121(f) and the remarks that follow.

**Regarding the Rejection of Claims 21 – 32 under 35 U.S.C. § 102(e):**

Applicants respectfully traverse the rejection of claims 21 – 32 under 35 U.S.C. § 102(e) as anticipated by Honda.

In order to properly establish that Honda anticipates Applicants' claimed invention under 35 U.S.C. § 102, each and every element of each of the claims in issue must be found, either expressly described or under principles of inherency, in that single reference. Furthermore, "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." See M.P.E.P. § 2131, quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). Regarding the 35 U.S.C. § 102(e) rejection, Honda does not teach each and every element of Applicants' present invention as claimed.

As recited in Applicants' independent claims, the present invention comprises:

"A thermoplastic material suitable for sealing a part of a conducting material and a semiconductor element electrically coupled with the conducting material, wherein the thermoplastic material has thermoplastic properties and a linear thermal expansion coefficient of  $6.0 \times 10^{-5} [1/^{\circ}\text{C}]$  or less at a temperature of  $80^{\circ}\text{C}$  to  $130^{\circ}\text{C}$ " (claim 21), and "A thermoplastic material for sealing a semiconductor element, wherein the thermoplastic material has thermoplastic properties and the linear thermal expansion coefficient of  $6.0 \times 10^{-5} [1/^{\circ}\text{C}]$  or less at a temperature of  $80^{\circ}\text{C}$  to  $130^{\circ}\text{C}$ " (claim 30).

In contrast to the present claimed invention, Honda teaches " $4.5 \times 10^{-5} [1/^{\circ}\text{C}]$  or less linear thermal expansivity at about 150-200  $^{\circ}\text{C}$ ." (col. 2, lines 9 – 11, and Honda's claim 1).

Therefore, Honda fails to disclose at least the above-quoted elements of Applicants' independent claims 21 and 30, and is different from the present invention for the reasons just presented. Since Honda does not disclose each and every element of Applicants' independent claims 21 and 30, Honda does not anticipate Applicants' claimed invention and does not disclose

an identical invention in as complete detail as contained in Applicants' independent claims 21 and 30. Applicants therefore submit that independent claims 21 and 30 are allowable, for the reasons argued above.

In addition, Applicants submit that dependent claims 22 – 29, 31, and 32 are also allowable at least by virtue of their respective dependence from allowable base claims 21 and 30. Accordingly, Applicants respectfully request that the Examiner withdraw the 35 U.S.C. § 102(e) rejection.

**Conclusion:**

In view of the foregoing, Applicants request reconsideration of the application and submit that the objection and rejections detailed above should be withdrawn. This Amendment should allow for immediate and favorable action by the Examiner. Applicants submit that pending claims 21 – 32 are in condition for allowance, and request a favorable action.

Should the Examiner continue to dispute the patentability of the claims after consideration of this Amendment, Applicants encourage the Examiner to contact Applicants' undersigned representative by telephone to discuss any remaining issues or to resolve any misunderstandings. Applicants' undersigned representative would welcome the opportunity to discuss the merits of the present invention with the Examiner if telephone communication will aid in advancing prosecution of the present application.

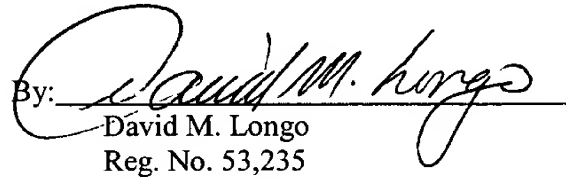
Please grant any extensions of time under 37 C.F.R. § 1.136 required in entering this response. If there are any fees due under 37 C.F.R. § 1.16 or 1.17 including any fees required for

an extension of time under 37 C.F.R. § 1.136, please charge such fees to our deposit account 06-0916.

Respectfully submitted,

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